

# **EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )  
 ) MDL No. 2804  
THIS DOCUMENT RELATES TO: ) Case No. 17-md-2804  
 )  
Track Three Cases )

VIDEOTAPED DEPOSITION OF KIMBERLY FRASER  
Conducted via Zoom  
Painesville, Ohio  
Monday, March 8th, 2021

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR  
JOB NO.: 4450197

1 things that exist naturally in nature, or the  
2 manmade versions, things like oxycodone, Vicodin,  
3 Percocet, but a pain responder.

4 Q. And do you understand that there are both  
5 prescription opioids and illicit opioids?

6 A. Yes, I do.

7 Q. Do you know the names of any prescription  
8 opioids?

9 A. As I said, Oxycontin, Percocet, Vicodin.  
10 Those are the ones most common -- that we see most  
11 commonly.

12 Q. And do you know the names of any illicit  
13 opioids?

14 A. Heroin, morphine.

15 Q. Have you heard of illicit fentanyl?

16 A. Certainly, yes.

17 Q. Are you aware that prescription opioids  
18 are legal medications?

19 A. Yes, I am.

20 MS. LEYIMU: Object to the form.

21 BY MR. FOTIADES:

22 Q. You're aware that prescription opioids can  
23 be sold legally in the United States pursuant to a  
24 prescription?

25 A. Yes, I am.